

3. Counsel is very active in the Oklahoma state court system and participated in multiple jury trials during this time period.
4. Since the filing of the action, the statute of limitation has lapsed. A dismissal, even without prejudice, would materially harm the Plaintiffs.
5. Federal Rule of Civil Procedure 4(m) allows that even without a showing of good cause, the Court may “order that service be made within a specified time.” If this Court was to Order that Service be completed within 30 days, or as the Court deems adequate, the Plaintiffs will comply.

WHEREFORE, Plaintiffs request this Court find good cause and extend the time for service or, in the alternative, order that service be made within a specified time under Fed. R. Civ. P. 4.

Respectfully submitted,

s/ Beau D. Phillips

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